

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RINAT HAFIZOV, :
Plaintiff, : Civil Action No.: 1:22-cv-08853 (JPC) (RWL)
v. :
BDO USA, LLP, JANET BERNIER and :
MATTHEW DYMENT, in their individual and :
professional capacities, :
Defendants. :
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**DECLARATION OF DAVID E. GOTTLIEB IN OPPOSITION TO DEFENDANTS'
MOTION TO QUASH**

I, David E. Gottlieb, an attorney at law, duly licensed to practice law before the Courts of the State of New York, hereby declare the following statements under penalties of perjury:

1. I am a Partner at the law firm Wigdor LLP, attorney for Plaintiff Rinat Hafizov in the above-captioned matter. This Declaration is submitted in connection with Plaintiff's Reply Memorandum of Law in Further Support of his Motion to Compel.
2. Attached hereto as **Exhibit A** is a true and accurate copy of Plaintiff's Rule 11 Letter to Defendants, sent *via* email to counsel for Defendants on September 18, 2023.
3. I declare that the foregoing is true and correct under penalties of perjury.

Dated: September 18, 2023
New York, New York

By: 
David E. Gottlieb